Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

By ECF/Email

Honorable Paul A. Crotty United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Ryan Ragonese</u>

19 Cr. 154 (PAC)

Hon. Judge Crotty:

4-3-2020 A conference is set for May 5, 2020 at 3:00 pm. Time is excluded through May 5, 2020. SO ORDERED.

With the consent of the Government, I write to respectfully request a two-month adjournment of Mr. Ragonese's April 6, 2020 status conference in light of the COVID-19 pandemic and its impact on our ability to work towards a possible resolution of this matter.

We request that the time between April 6, 2020 and the next court date be excluded under the Speedy Trial Act. Excluding time will serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the government and defense counsel to continue discussions regarding a possible disposition in the matter.

Respectfully submitted,

/s/ Ariel Werner
Ariel Werner
Assistant Federal Defender

CC: AUSA Dan Wolf